<u>REMARKS</u>

Claims 9-13, 17-29, 31-36, 38-42, and 51 are pending after this amendment.

Claims 9-13, 17, 20-26, 29, 36, and 51 have been amended. Claims 30 and 37

have been canceled.

Claims 9-13, 17-42, and 51 have been rejected under 35 U.S.C. § 103(a) as being

unpatentable over Kahn. This rejection is respectfully traversed.

Claims 9 recites:

A method of integrating a plurality of human resource and employee benefit
products, some of the products comprising a source of data, wherein at least two of
the products format the sources of data differently, the method comprising:
   receiving a request from a requestor to conduct an operation on the data of the
plurality of products;
   conducting the operation on a shared data source;
   initiating a plurality of tasks to perform the operation for each of the plurality
of products, wherein same data regarding the operation to be performed is formatted
to accommodate different formatting of each of the data source belonging to the
plurality of products;
   determining which of the plurality of tasks are critical and creating a sorted
first list of all the tasks initiated to perform the operation on the plurality of products
that are determined to be critical;
   synchronously executing the tasks from the first list, wherein one the task is
being executed at a time in order of priority, with a subsequent task waiting for a
previous task to complete;
   determining which of the plurality of tasks are not critical and creating a
second list of all the tasks initiated to perform the operation on the plurality of the
products that are determined to be non-critical; and
   executing the tasks from the second list in asynchronous order.

By determining which of the plurality of tasks are critical and which of the plurality

of tasks are not critical, the claimed method is able to prioritize the various tasks and

to execute the tasks on each product in an organized fashion in accordance with each task's relative importance. As a result, an operation may be performed on the various products more effectively, more fault-tolerant, and with less overhead on system resources.

Kahn does not teach or suggest any such technique. Kahn discloses a centralized back-end payroll service with a web-based payroll system. Kahn does not disclose or suggest determining critical and non-critical tasks such that the system executes critical tasks synchronously on human resource and employee benefit products and executes non-critical tasks asynchronously on such products. Instead, Kahn merely discloses that "[t]he system automatically calculates overtime, imputed income, and paid-time-off benefits between employers and employees" (Abstract), without any reference to the criticality of such tasks. Kahn makes no mention of any determination of which of these tasks are more or less critical, and then executing the tasks based on that determination. Thus Kahnis unable to prioritize tasks and to execute such tasks in an organized fashion, and does not provide the benefit of performing an operation more effectively, more fault-tolerant, and with less overhead on system resources.

Accordingly, claim 9 is patentably distinct over Kahn.

Claims 10-13 depend from claim 9 and therefore incorporate the limitations of claim 9. Claims 10-13 are therefore patentably distinct over Kahn for the reasons

discussed above. In addition, claims 10-13 recite additional features that further distinguish them from Kahn.

For example, claim 11 recites "wherein if any one of the synchronously executed tasks is not successfully completed all the synchronously executed tasks are rolled back." Claim 12 recites "wherein the tasks from the second list are executed by queuing and scheduling execution according to requirements of the products that are determined to be non-critical and executing the tasks at a scheduled time." Kahn does not disclose such techniques. Nowhere in Kahn is there any hint or suggestion that executed tasks are rolled back or that tasks are executed by queuing and scheduling execution according to product requirements.

Claim 21 recites limitations similar to that discussed above in connection with claim 9. Claims 22-25 are dependent upon claim 21 and incorporate the limitations of claim 21. Therefore, claims 21-25 are allowable over the prior art.

Claim 17, as amended, recites a network site with "one or more network links from the computer server to computer servers of corresponding third party providers, each of whom offers one or more human resource and employee benefit products . . . comprising a second set of human resource and employee benefits products." Claim 17 also recites that the computer server determines the appropriate application comprising "an integrated benefits package comprising one or more applications from the first and second sets of human resource and employee benefits products." Claim 17 further recites that "the third party providers are bound to a

determined price of their applications included in the integrated benefits package."

By offering an integrated benefits package comprising both internal human resource and employee benefit products and third-party provided products, the network site is able to offer users a benefits package that does not require the users to deal directly with individual third party providers. Furthermore, by binding the third party providers to a determined price of their applications in the integrated benefits package, the network site is able to provide a price quotation for the integrated benefits package to the users. As a result, the users view the integrated benefits package as offered by a single source.

Kahn does not teach or suggest any such technique. Even though Kahn discloses that "[t]he system can provide Employers with the ability to form affiliate relationships with third-party providers of employee benefit plans . . . and enables the Employer to provide personalized benefit plan options from which employees could select" (52:44-50), it fails to teach or suggest a network site that offers an integrated benefits package comprising both internal human resource and employee benefit products and third-party provided products. Instead, Kahn teaches two different approaches to offering the third party products, both of which are quite different from the approach of claim 17. On the one hand, Kahn teaches that "[t]he system includes electronic copies of forms of third-party payroll systems . . . in order to enable an Employer . . . to populate system databases with the Employer's information." (52:39-42). Thus, Kahn merely has the Employer stores copies of forms

from the third party providers, and its employees access the forms form the Employer's system and fill them out. On the other hand, Kahn has the Employer's system include "links to providers' web sites." (52:51-53). Thus, Kahn merely discloses a payroll system that includes links to third party providers; as a result the employees still have to deal directly with individual third party providers in order to obtain their human resource and employee benefit products. Thus, unlike the network site of claim 17, Kahn is unable to offer an integrated benefits package that users view as offered by a single source without having either of the problems or limitations of Kahn's different approaches.

In addition, Kahn also fails to teach or suggest that a network site binds third party providers to a determined price of their applications in the integrated benefits package. The cited portion of Kahn merely discloses custom rate tables for health insurance plans offered by third party providers. Thus, the system of Kahn merely provides information regarding products offered by third party providers without negotiating with or otherwise binding such third party providers to a price quoted to its users. The disclosure of such rate tables does not disclose or suggest that a network site binds a third party provider to a determined price of its product included in an integrated benefits package, since the users in Kahn need to deal directly with any third party provider and Kahn does not disclose negotiating with third party providers to produce a price quotation for its users.

Accordingly, claim 17 is patentably distinct over Kahn.

Claims 18-20 depend from claim 17 and therefore incorporate the limitations of claim 17. Claims 18-20 are therefore patentably distinct over Kahn for the reasons discussed above. In addition, claims 18-20 recite additional features that further distinguish them from Kahn.

Claim 26, as amended, recites a "network computer server that manages and administers a plurality of human resource and employee benefit products . . . being implemented on a plurality of third party network computing devices." Claim 26, as amended, also recites that the "processor performs the actions in an integrated fashion according to a format of each of the plurality of products." By managing and administering a plurality of products being implemented on a plurality of third party network computing devices, the network computer server is able to provide users an integrated system that does not require the users to deal directly with individual third party providers. As a result, the users can use a single source to manage and administer a plurality of third party products.

Kahn does not teach or suggest any such technique. Again, even though Kahn discloses that "[t]he system can provide Employers with the ability to form affiliate relationships with third-party providers of employee benefit plans . . . and enables the Employer to provide personalized benefit plan options from which employees could select" (52:44-50), it fails to teach or suggest that the payroll system is capable of managing and administering products provided by third parties. In fact, all of the data management functions in Kahn relate to the internal payroll system. The

payroll system of Kahn merely provides links to third party web sites for its users to access further information regarding third party products. This fails to provide the benefit of the claimed limitation because users in Kahn have to deal directly with third party providers, and they cannot use a single source to manage and administer a plurality of third party products.

Moreover, Kahn fails to suggest or teach a processor that performs actions on data sources according to a format of each of a plurality of products. The Examiner suggested that Kahn discloses seamlessly integrating employer data and third party data and thus makes obvious to one of ordinary skill in the art to accommodate different formatting of each data source. However, as discussed, Kahn merely allows its users access to third party web sites without providing management and administrative functions for third-party provided products. Linking from the Employer's website to a third party site does not constitute "seamless" integration, merely a hyperlink from one network location to another. As the examiner is certainly aware, linking between different websites, such as on the Internet, does not "seamlessly integrate" the underlying functionality and data of the two websites, and thus does not inherently allow for operating on differently formatted data. Therefore, since Kahn does not perform actions on third party products, Kahn does not disclose or suggest that its system accommodates different formatting of each third party data source. Accordingly, claim 26 is patentably distinct over Kahn.

Claims 27 and 28 depend from claim 26 and therefore incorporate the limitations of claim 26. Claims 27 and 28 are therefore patentably distinct over Kahn for the reasons discussed above. In addition, claims 27 and 28 recite additional features that further distinguish them from Kahn.

Claim 29, as amended, recites "converting the retrieved updated data records into a data format that is compatible with the requesting network process" and "providing the converted data records to the requesting network process." By converting the data records into a format that is compatible with the requesting network process, the claimed method is able to centrally manage data records for various computer network processes. As a result, users of the integrated human resource management system does not need to deal directly with each of the computer network processes and can manage different computer network processes at a single management system.

Kahn does not teach or suggest any such technique. The Examiner suggested that Kahn discloses seamlessly integrating employer data and third party data and thus makes obvious to one of ordinary skill in the art to accommodate different formatting of each data source. However, as discussed, the system of Kahn only allows a user access to a third party web site. That is, the system of Kahn does not provide management functions for products provided by third parties. Therefore, since Kahn does not allow a user to update data records of third party products, he

does not disclose that its system accommodates different formatting of each requesting network process.

Accordingly, claim 29 is patentably distinct over Kahn.

Claim 30 has been canceled by this amendment.

Claims 31-35 depend from claim 29 and therefore incorporate the limitations of claim 29. Claims 31-35 are therefore patentably distinct over Kahn for the reasons discussed above. In addition, claims 31-35 recite additional features that further distinguish them from Kahn.

Claim 36, as amended, recites limitations similar to that discussed above in connection with claim 29. Claims 38-42 are dependent upon claim 36 and incorporate the limitations of claim 36. Therefore, claims 36 and 38-42 are allowable over the prior art.

Claim 37 has been canceled by this amendment.

Claim 51, as amended, recites "a first display area for displaying at least one recommendation relating to the third party provider product of the package" and "a second display area . . . for displaying at least one reminder for the third party provider product of the package." By displaying a recommendation and reminder for the third party provider product of the package, the user interface of claim 51 is able to timely inform users what actions need to be taken with respect to the third party provider product in the integrated package. Therefore, users can more effectively manage their third party provider products using the user interface.

Kahn does not teach or suggest the claimed user interface. As previously stated, nowhere in Kahn is there any hint or suggestion of the offering of an integrated package that includes an employee administration product provided by a third party. At best, Kahn merely discloses that the Employer's system includes "links to the providers' web sites." (52:51-53). In other words, Kahn only provides users access to a third party web site and does not provide a user interface that displays a recommendation relating to a third party provider product in response to receiving data indicating entry into a time period for a life event and that displays a reminder for the third party provider product. This fails to provide the benefit of the claimed limitation because users cannot manage third party provider products using the payroll system of Kahn. Accordingly, claim 51 is patentably distinct over Kahn.

Based on the above amendments and remarks, consideration of this application and the early allowance of all claims herein are requested.

Should the Examiner wish to discuss the above amendments and remarks, or if the Examiner believes that for any reason direct contact with Applicants' representative would help to advance the prosecution of this case to finality, the Examiner is invited to telephone the undersigned at the number given below.

Respectfully submitted,
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Pham

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By: _Hsiang H. Lin (signature)_

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